

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**STATE OF MINNESOTA, by and
through its Attorney General Keith Ellison**

Plaintiff,

v.

**DONALD J. TRUMP, in his official
capacity as President of the United States:
UNITED STATES DEPARTMENT OF
JUSTICE; PAMELA BONDI in her
official capacity as Attorney General of
the United States**

Defendants.

Court File No. 25-CV-1608 (ECT/DLM)

**DEFENDANTS' MOTION TO
DISMISS THE COMPLAINT**

Defendants Donald J Trump, United States Department of Justice, and Pamela Bondi move to dismiss all claims against all Defendants under Federal Rule of Civil Procedure 12. This Court should dismiss the Complaint, ECF No. 1, because:

1. under Rule 12(b)(1), the Court lacks subject matter jurisdiction; and
2. under Rule 12(b)(6), Plaintiff has failed to state a claim upon which relief can be granted.

This Motion is based on the accompanying Memorandum of Law in Support, the Complaint, and the entire record of proceedings in this case.

Respectfully submitted,

/s/ Matthew J. Donnelly
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Counsel for the Federal Defendants

Dated: June 26, 2025